


UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

MABEL de JONGE,)	File No. Civ. 10-4088
Plaintiff,)	
)	
v.)	
)	PLAINTIFFS' MOTION FOR JOINDER
Ability Insurance Company, f/k/a)	
Medico Life Insurance Company,)	
Ability Resources, Inc.,)	
Ability Reinsurance Holdings Limited,)	
a Bermuda Limited Company, Ability)	
Reinsurance Limited, a Bermuda)	
Limited Company, and Medico)	
Insurance Company.)	
)	
Defendants.)	
)	
)	

COMES NOW the Plaintiff, by and through her attorney Mike Abourezk, and pursuant to Fed. R. Civ. P. 42(a), hereby moves the Court for an order joining Plaintiff's present action with corresponding cases separately filed in *Larry Stolz as Personal Representative of the Estate of Edna Wenzel; and Jean Andal, on her own behalf, vs. Ability Insurance Company, f/k/a Medico Life Insurance Company, Ability Resources, Inc., Ability Reinsurance Holdings Limited, a Bermuda Limited Company, Ability Reinsurance Limited, a Bermuda Limited Company, and Medico Insurance Company*, CIV. No. 10:4047.

The grounds for this motion are more fully set forth in Plaintiffs' Memorandum in Support of Motion for Joinder.

Dated this 19 day of August, 2011.

By: 
Mike Abourezk
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a true and correct copy of the foregoing **PLAINTIFF'S MOTION FOR JOINDER**, by electronic filing with the Clerk of Court's upon Defendants:

Mr. Gregory J. Erlandson
Mr. Terry Westergaard
Mr. Dan Duffy
Bangs, McCullen, Butler, Foye & Simmons
P.O. Box 2670
Rapid City, SD 57709-2670

on this 19 day of August, 2011.


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